REMARKS / ARGUMENTS

These remarks are made in response to the Advisory Action of March 31, 2004, and accompany a Request for Continued Examination. This response is being filed with a petition for a one-month retroactive extension of time.

Claims 1-37 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2002/0076025 to Liversidge, et al. (Liversidge). To overcome Liversidge, the Applicants have submitted affidavits under 37 C.F.R. § 1.131, which were deemed insufficient by the Examiner in terms of demonstrating conception. Notwithstanding the Applicants' belief to the contrary, the Applicants have set forth differences demonstrating the patentability of the instant application over Liversidge.

Liversidge discloses a proprietary collaboration services suite for supporting various telecommunications services. (See FIG. 2 and paragraph 65) Liversidge discloses a system requiring multiple components such as a VTE server, a presence server, a database, as well as one or more VTE clients. Through the Liversidge system, a user can send an invitation request message from the user's interface to the collaboration services suite (i.e. VTE server, presence server, and database). The collaboration services suite analyzes the invitation and selects an available communications medium using dynamic presence detection and availability information maintained by the suite. The invitation is then forwarded to the invitee using the selected medium.

Paragraphs 134-137, 181-191, and FIGs. 25 and 28 of the Liversidge reference have been cited in rejecting claims 1-37 under 35 U.S.C. § 102(e). Paragraphs 134-138 and FIG. 25 of Liversidge provide a description of the invitation object that is opened by one of the VTE client applications to initiate a communication session. FIG. 28 and paragraphs 181-191 illustrate message flows for establishing a communication session and connecting to a conference bridge.

The cited portions of Liversidge indicate only that messages can be sent to invite team members to communication sessions and message flows for establishing communication sessions. More particularly, the messages disclosed by Liversidge appear to be primarily internal system messages and messages directed to the telephony network for establishing a communication session. Notably lacking from the cited portions of Liversidge, however, is any mention of e-mail being used as a vehicle for sending a voice conference identifier – a feature

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that is explicitly required by the Applicants' pending claims.

Further, in contrast to the Applicants' invention, the proprietary, interactive workgroup environment provided by Liversidge requires a VTE server and a presence server working in conjunction with one another. The following excerpts from Liversidge, as well as paragraph 65, illustrate the operation of the system and reliance upon presence detection as well as processing by the VTE server.

- The Presence Server 42 incorporates functionality adapted to detect the current operational status of each of the communications devices identified in the current profile 10, and store the detection result within the database 6 as communications information for each respective VTE client 4. (paragraph 66, lines 1-6)

- Accordingly, the VTE server 40 incorporates functionality related to the negotiation of team member log-in to the collaboration service suite 2, the forwarding of team member preference and presence information 30 to each VTE client 4, and the forwarding of status updates concerning active communications sessions to each VTE client 4. (paragraph 65, lines 22-28)

- The invitation request message is analyzed at the collaboration services suite, and the invitation is sent from the collaboration services suite to the person, using a preferred, available communication medium selected by the collaboration services suite using dynamic presence availability information maintained by the collaboration services suite." (paragraph 14, lines 9-15)

- The collaboration services suite analyzes the invitation request message to determine the type of communications session being requested, and determine whether the person to be invited is a team member." (paragraph 17, lines 1-4)

- In general, interaction between the collaboration service suite 2 and the communications devices associated with each team member (i.e. encompassed by each VTE client 4) is controlled by the VTE server 40. Accordingly, the VTE server 40 incorporates functionality related to the negotiation of team member log-in to the collaboration services suite 2, the forwarding of team member preference and presence information 30 to each VTE client 4, and the forwarding of status updates concerning active communications sessions to each VTE client 4. The VTE server 40 also provides functionality related to the initiation and control of communications involving one or more team members, as will be described in greater detail below. (paragraph 65, lines 18-31)

Thus, it is apparent that Liversidge utilizes and requires the presence server and the VTE server, a proprietary server, to function. Liversidge tracks presence information for each

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VTE client using the VTE and presence servers.

In contrast, the Applicants' invention allows a user to send a voice conference identifier to another user via e-mail. The sender and recipient of the e-mail are not required to be located on or logged onto a proprietary virtual working environment. As such, the instant invention requires no presence detection or proprietary system server such as the VTE server. Instead, the Applicants' invention utilizes e-mail clients configured to send and receive e-mails having voice conference identifiers and a conventional e-mail server. The e-mail server performs no additional processing as does the VTE server.

In summary, Liversidge discloses a proprietary and closed system that utilizes presence detection and a proprietary server to function. As such, Liversidge requires users to be logged on to the system to participate and set up telecommunication sessions. The Applicants' invention relies upon e-mail and neither requires nor utilizes presence detection. Further, the use of e-mail as a vehicle for sending a voice conference identifier is required by the language of Applicants' claims, but is not disclosed in the portions of Liversidge relied upon in support of the § 102 rejection.

In light of the foregoing, withdrawal of the 35 U.S.C. § 102(e) rejection with respect to claims 1-37 is respectfully requested. The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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Gregory A. Nelson, Reg. No. 30,577
Kevin T. Cuenot, Reg. No. 46,283
AKERMAN SENTERFITT
P.O. Box 3188
West Palm Beach, FL 33402-3188
Tel: 561-653-5000

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